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August 12, 2025

**VIA ECF**

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;  
*Jones et al. v. Abel et al.*, No. 1:25-cv-00779-LJL**

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC (“TAG”), and Jennifer Abel (collectively, the “Wayfarer Parties”), we respectfully request an extension of time, until the end of August 15, 2025, to respond to Blake Lively’s motions to compel non-parties Katherine Case (Dkt. 585) and Breanna Butler Koslow (Dkt. 586) (collectively, the “Motions to Compel”). Ms. Case is a former employee of TAG and Ms. Koslow is currently employed by TAG. No previous requests for an extension of time have been sought.

The Motions to Compel may implicate the attorney-client and other privileges held by the Wayfarer Parties (*see, e.g.*, Dkt. 586, p. 2) and therefore the Wayfarer Parties should be accorded an adequate opportunity to review the materials in question from Ms. Koslow and Ms. Case’s counsel and to then address any privilege issues to the Court.

Respectfully submitted,

/s/ Kevin Fritz

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cc: all counsel of record (via ECF)